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FILED
DISTRICT COURT OF GUAM

JAN 23 2008

**JEANNE G. QUINATA
Clerk of Court**

Attorneys for the United States of America

**IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM**

UNITED STATES OF AMERICA.

CRIMINAL CASE NO.

08-00003

Plaintiff,

INDICTMENT

VS.

DEUK SOON CHOI.

CRIMINAL CONSPIRACY
[18 U.S.C. §§ 2 & 371]

Defendant.

**FRAUD IN CONNECTION WITH
IDENTIFICATION DOCUMENTS**
[18 U.S.C. §§ 2 & 1028(a)(1); 1028(b)(1)(A)(ii)
& 1028(c)(3)(A)]

THE GRAND JURY CHARGES:

COUNT I - CRIMINAL CONSPIRACY

On or about March 25, 2004, within the District of Guam, the defendant herein, DEUK SOON CHOI, did willfully and knowingly combine, conspire, confederate and agree with Eun Young Lee and others, both known and unknown to the Grand Jury, to commit the offense of Fraud in Connection with Identification Documents, in violation of Title 18, United States Code, Section 1028(a)(1), and to aid, abet, counsel, command, induce and procure the conspiracy charged in this count and willfully cause others to perform acts and make statements in furtherance of the conspiracy, and did perform at least an overt act for the purpose of carrying out

the conspiracy, to-wit: the submission of an application for a Guam driver's license, said
application bearing a false Taxpayer Identification Number (TIN) 943-79-1970

ALL IN VIOLATION of Title 18, United States Code, Sections 2 and 371.

COUNT II - FRAUD IN CONNECTION WITH IDENTIFICATION DOCUMENT

On or about March 25, 2004, in the District of Guam, the defendant herein, DEUK SOON CHOI, did knowingly and without lawful authority produce an identification document, authentication feature and false identification document, to-wit: Guam driver's license number 1228097589, by means of a false Internal Revenue Service Taxpayer Identification Number (TIN) 943-79-1970, and the production of said driver's license was in and affected interstate and foreign commerce,

ALL IN VIOLATION of Title 18, United States Code, Sections 2, 1028(a)(1),
1028(b)(1)(A)(ii) and 1028(c)(3)(A).

DATED this 23rd day of JANUARY 2008.

A TRUE BILL.

REDACTED

LEONARDO M. RAPADAS
United States Attorney
Districts of Guam and NMI

By: Karon V. Johnson
KARON V. JOHNSON
Assistant U.S. Attorney

Reviewed:

By: Jeffrey J. Strand
JEFFREY J. STRAND
First Assistant U.S. Attorney

Place of Offense:City Hagåtña**Related Case Information:****08-00003**

Country/Parish _____

Superseding Indictment _____ Docket Number _____

Same Defendant _____ New Defendant x _____

Search Warrant Case Number _____

R 20/ R 40 from District of _____

Defendant Information:Juvenile: Yes No X Matter to be sealed: x Yes NoDefendant Name DEUK SOON CHOI**R E C E I V E D**
JAN 23 2008

Alias Name _____

Address _____
_____DISTRICT COURT OF GUAM
HAGATNA, GUAMBirthdate Xx/xx/ SS# xxx-xx- Sex F Race A Nationality Korean**U.S. Attorney Information:**AUSA Karon V. JohnsonInterpreter: No X Yes List language and/or dialect: Korean**Location Status:**

Arrest Date _____

- Already in Federal Custody as of _____ in _____
- Already in State Custody
- On Pretrial Release

U.S.C. CitationsTotal # of Counts: 1 2 Petty Misdemeanor X Felony

<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count(s)</u>
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Set 1	<u>18 USC 2 & 371</u> <u>18 USC 2, 1028(a)(1);</u>	<u>Criminal Conspiracy,</u> <u>1028(b)(1)(A)(ii);</u>	<u>1</u>
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Set 2	<u>1028(c)(3)(A)</u>	<u>Fraud in Connection with Identification</u> <u>Documents</u>	<u>2</u>
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Set 3	<u> </u>	<u> </u>	<u> </u>
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Set 4	<u> </u>	<u> </u>	<u> </u>
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(May be continued on reverse)

Date: 07/07 Signature of AUSA: Karon V. Johnson